

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

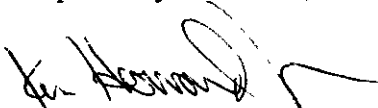
In the Matter of )  
 )  
Amendment of Section 73.606(b) ) MB Docket No. 04-31  
Table of Allotments ) RM-10853  
Television Broadcast Stations. )  
(Gainesville, Florida) )

TO: The Commission

Comments Of Tampa Bay Television, Inc.

Tampa Bay Television, Inc., the licensee of television station WFTS-DT, Tampa, FL  
(Facility ID #64588), through counsel, hereby submits the attached Engineering Statement of  
John F.X. Browne, P.E., for consideration in the above-referenced rule making proceeding.

Respectfully submitted,



Kenneth C. Howard, Jr.  
Counsel to Tampa Bay Television, Inc.

BAKER & HOSTETLER LLP  
1050 Connecticut Avenue, NW  
Suite 1100  
Washington, DC 20036  
202-861-1500

Date: April 12, 2004

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**Engineering Statement**  
**OF**  
**JOHN F.X. BROWNE, P.E.**  
**COMMENTS ON PROPOSED RULEMAKING**  
**CHANNEL 29, GAINESVILLE, FL**  
**(MB DOCKET No. 04-31 / RM-10853)**  
**SUBMITTED BY**  
**TAMPA BAY TELEVISION, INC.**

Tampa Bay Television, Inc. is the licensee of WFTS-DT which operates on Channel 29 at Tampa, FL. Gainesville Channel 61 Associates, LLC (GCA) petitioned for institution of a rule making proceeding to alter its Channel 61 allotment at Gainesville, FL to specify Channel 29 with the following parameters:

Coordinates:	29°-37'-47" N (NAD 27) 82°-34'-24" W
ERP:	3600 kW (Directional) <sup>1/</sup>
HAAT:	278 m
RCAMSL:	305 m

The Commission issued an NPRM on February 20, 2004, proposing to make the requested change in the Table of Allotments.

Interference studies conducted indicate that the proposed Channel 29 facility would receive 1.3% interference from WFTS-DT (Channel 29 at Tampa, FL) in addition to 0.2% that

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<sup>1/</sup> The NPRM does not reference the directional pattern (Appendix A, attached hereto, depicts the directional antenna pattern as-filed in the proposed rulemaking).

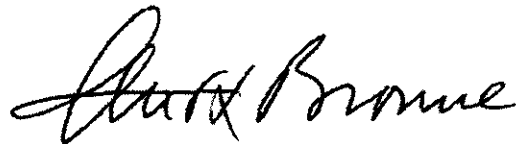
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the proposed facility would receive from other existing stations for a total of 1.5%. The proposed Channel 29 facility must accept any interference from existing stations; the 1.5% interference received from WFTS and other stations should be considered the baseline interference for future maximization studies by other stations. Thus, should WFTS-DT propose to maximize its facility, it would be allowed to cause an additional 2% interference to the proposed Channel 29 facility (3.5% total prior to application of masking considerations).

If the Commission elects to adopt the Proposed Rule Making, its notice should establish the filed antenna pattern and ERP as part of the allotment and, further, should establish a reference "base" population for use in interference studies.

**Certification**

I hereby certify that the foregoing report or statement was prepared by me but may include work performed by others under my supervision or direction. The statements of fact contained therein are believed to be true and correct based on personal knowledge, information and belief unless otherwise stated; with respect to facts not known of my own personal knowledge, I believe them to be true and correct based on their origin from sources known to me to be generally reliable and accurate. I have prepared this document with due care and in accordance with applicable standards of professional practice.



John F.X. Browne, P.E.  
March 23, 2004

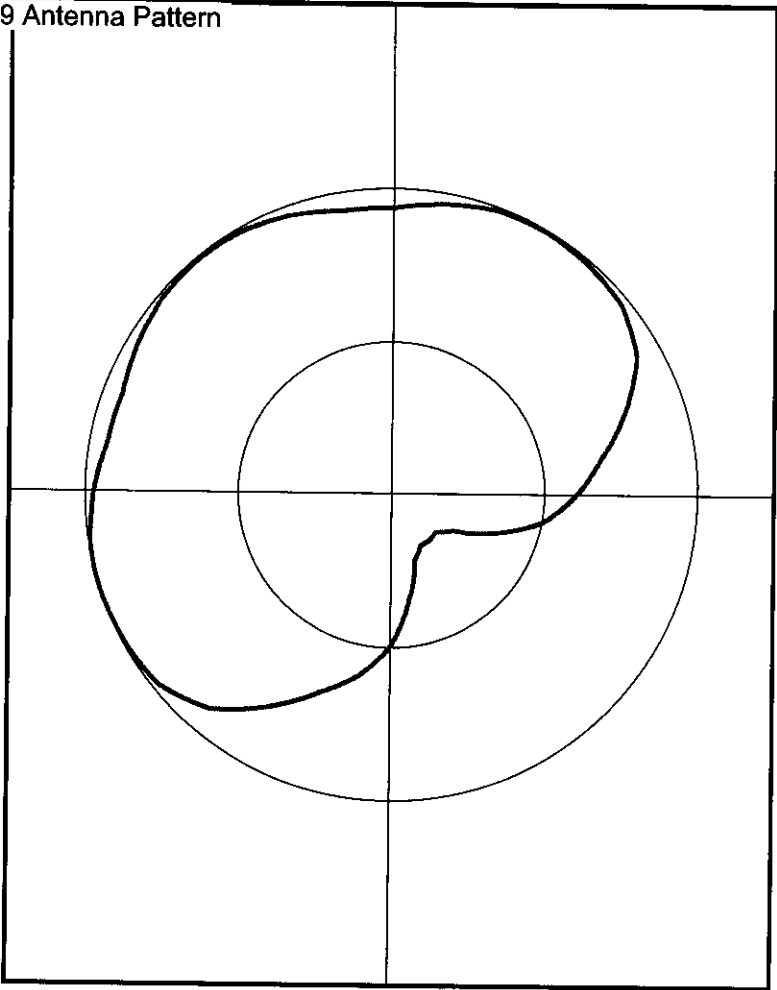


## **Appendix A**

# Gainesville Channel 61 Associates, LLC Proposed Channel 29 Antenna Pattern

Pre-Rotation Antenna Pattern

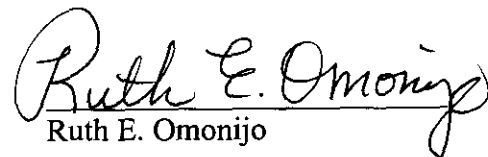
Azimuth (deg)	Effective Field
0 0	0.935
10 0	0.963
20 0	0.989
30 0	0.994
40.0	0.987
50 0	0.974
60 0	0.921
70.0	0.811
80 0	0.695
90 0	0.604
100 0	0.504
110 0	0.363
120 0	0.235
130 0	0.190
140 0	0.195
150 0	0.193
160 0	0.228
170 0	0.348
180 0	0.495
190 0	0.602
200 0	0.691
210 0	0.803
220.0	0.917
230 0	0.979
240 0	0.993
250 0	0.999
255 0	1.000
260 0	0.996
270.0	0.972
280 0	0.941
290 0	0.937
300 0	0.963
310 0	0.985
320 0	0.992
330 0	0.987
340 0	0.966
350 0	0.938



## **CERTIFICATE OF SERVICE**

I, Ruth E. Omonijo, a secretary in the law firm of Baker & Hostetler LLP, certify that on this 12<sup>th</sup> day of April, 2004, I have caused a copy of the foregoing "Comments of Tampa Bay Television, Inc." to be sent via First Class United States Mail, postage prepaid, to the following:

David D. Oxenford  
Shaw Pittman  
2300 N Street, NW  
Washington, DC 20037-1128

  
Ruth E. Omonijo